

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**KONINKLIJKE PHILIPS ELECTRONICS
N.V. and U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

Civil Action No.: 7:08-CV-04068 (CLB)

**THE ADS GROUP fka ADVANCED
DUPLICATION SERVICES LLC;
AMERICAN MEDIA INTERNATIONAL,
LTD.; CARBONITE INC.; THE
COMVEST GROUP; EVA-TONE, INC.;
HAL LEONARD CORP.; HUDSON
VALLEY CAPITAL PARTNERS, INC.;
INOVERIS LLC; INTUIT INC.; MALACO
ENTERTAINMENT LLC; METATEC
INTERNATIONAL, INC.; MTI
ACQUISITION LLC aka MTI
ACQUISITION CORP.; MUSIC CITY
OPTICAL MEDIA, INC.; ZOMAX
INCORPORATED; MICHAEL F.
HARDWICK, an individual; ARUN
KHURANA, an individual;
JEAN A. GALOTTE JR., an individual;
JOHN EDGAR MOLL, an individual;
JOHN STEVEN MOLL, an individual;
DAVID A. SILVON, an individual;
and John Does Nos. 1 through 100,**

Defendants.

DECLARATION OF JOHN STEVEN MOLL

I, John Steven Moll, pursuant to 28 U.S.C. Section 1746, under penalty of perjury, state and declare as follows:

1. I am President and CEO of the Defendant, Music City Optical Media, Inc. ("Music City"). I am over the age of 18, have personal knowledge of the following facts, and if called as a witness, could and would testify competently thereto.

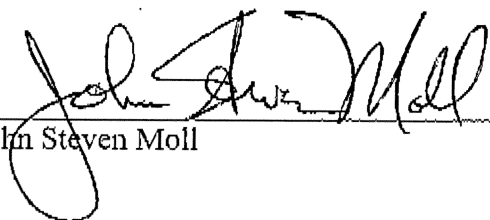
2. I am a resident of Tennessee. I am not a resident of New York, and have not lived in New York.

3. Music City is a Tennessee corporation. I work out of Music City's offices in Laverne, Tennessee. I attend business meetings and board meetings at Music City's offices in Laverne, Tennessee. Music City has no offices in New York. I do not conduct personal business in New York.

4. I am not a party to the CD Disc Patent License Agreement between Music City and Koninklijke Philips Electronics N.V. I have not traveled to New York in connection with this license agreement.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED THIS 24th DAY OF JUNE, 2008.


John Steven Moll